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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) CR 24-00152 WHO  
Plaintiff, )  
v. ) UNITED STATES' WITNESS LIST  
CSABA JOHN CSUKÁS, ) Pretrial: October 8, 2024  
Defendant. ) Trial: October 21, 2024  
 ) Court: Honorable William H. Orrick

The United States of America (“United States”) hereby submits its list of prospective witnesses who may be called (other than those called solely for impeachment or rebuttal) to testify at trial. The United States reserves its rights, in keeping with the Federal Rules of Criminal Procedure, to expand or modify this list before trial and to call additional witnesses as may be necessary during trial:

Notices and disclosures for the below witnesses under Federal Rules of Evidence 602, 702, 703.

1 and/or 705 have been provided to the defense:

2       1.       Payton Barnes (Subpoena Compliance Specialist, Lyft, Inc.): Payton Barnes may testify  
3 regarding Lyft, Inc. policies governing users of the Lyft platform. Ms. Barnes may further testify about  
4 records and communications on the Lyft platform, including how users communicate with other users,  
5 what is displayed to specific users (ex., drivers and riders) about specific rides and pickup information,  
6 and what data Lyft stores about rides. Ms. Barnes may further testify regarding how rides are assigned  
7 at San Francisco International Airport versus non-airport locations, and how users report safety or other  
8 issues to Lyft. Ms. Barnes may further testify regarding Lyft's relationship with Flexdrive, LLC for  
9 leasing of vehicles. Ms. Barnes may further testify regarding her role as a Subpoena Compliance  
10 Specialist at Lyft, Inc., and as a custodian of records for documents produced by Lyft during the  
11 investigation of this matter.

12       2.       S.B. (Victim): S.B. may testify regarding his interaction with Defendant and the assault  
13 on him by the Defendant at San Francisco International Airport on October 26, 2024. S.B. may further  
14 testify regarding a video he took of Defendant immediately after the assault, his reporting of the assault  
15 to Lyft and to police, physical pain and injuries sustained as a result of the assault, subsequent medical  
16 visits and treatments, and damage to property as a result of the assault, including to an in-ear wireless  
17 device owned by S.B.

18       3.       Revital Barshechet: Ms. Barshechet may testify regarding her observations of S.B. and  
19 actions taken after she arrived at San Francisco International Airport on October 26, 2023, including  
20 observations of injuries to S.B., and S.B.'s medical appointments and actions in the months after the  
21 assault.

22       4.       Ofc. Fidel Gonzalez (San Francisco Police Department): Officer Fidel Gonzalez may  
23 testify regarding his response to a call for service at San Francisco International Airport Garage Level 5,  
24 statements he took from the victim and witnesses subsequent to the call for service, and other  
25 investigative steps taken in case 23-29960, including taking photographs, collection of surveillance  
26 video evidence of the assault and license plate information for Defendant's vehicle.

27       5.       Robyn Lipkowitz (Eyewitness): Robyn Lipkowitz may testify as a witness to the assault  
28 on S.B. at San Francisco International Airport on October 26, 2024.

1       6.       Matt Maychrowitz (Intellicene): Sr. Software Engineer Matt Maychrowitz may testify  
2 about retrieval, extraction, and production of video files from San Francisco International Airport's  
3 closed-circuit video ("CCTV") system.

4       7.       Kathleen Millspaugh (Special Agent, FBI): Special Agent Millspaugh may testify about  
5 items seized pursuant to a search warrant served on Reddit, Inc., and her possession and custody of  
6 physical evidence obtained in the investigation, including the victim's wireless in-ear devices. Special  
7 Agent Millspaugh may further testify regarding evidence collected during the investigation and  
8 prosecution of this matter by subpoena, search warrant, and other legal process, or from publicly  
9 accessible sources and voluntarily provided evidence. Special Agent Millspaugh may further testify  
10 regarding statements made by Defendant in an interview conducted on January 10, 2024. Special Agent  
11 Millspaugh will attend trial at counsel's table and may testify regarding summaries of voluminous  
12 evidence admitted at trial, including but not limited to financial records and records related to rideshare  
13 rides.

14       8.       Deputy Jeffrey Morgan (San Mateo County Sheriff's Office): Deputy Morgan may  
15 testify regarding his investigation of the assault on S.B. and collection of surveillance video evidence of  
16 the assault and license plate information for Defendant's vehicle.

17       9.       Ofc. Wilson Ng (San Francisco Police Department): Officer Wilson Ng may testify  
18 regarding his response to a call for service at San Francisco International Airport Garage Level 5,  
19 statements he took from the victim and witnesses subsequent to the call for service, and other  
20 investigative steps taken in case 23-29960, including taking photographs, collection of surveillance  
21 video evidence of the assault and license plate information for Defendant's vehicle.

22       10.       Kathryn Taylor (Special Agent, FBI): Special Agent Taylor may testify about items  
23 seized pursuant to a search warrant served on Reddit, Inc., statements made by Defendant in an  
24 interview conducted on January 10, 2024, and her possession and custody of physical evidence obtained  
25 in the investigation, including the victim's wireless in-ear devices.

26       11.       Alexandria Wylie: Alexandria Wylie may testify regarding a Lyft ride she received from  
27 Defendant during the evening of October 26, 2024, and statements made by Defendant relevant to  
28 Defendant's state of mind.

## Custodians of Record

12. California Department of Motor Vehicles: A custodian of records for California Department of Motor Vehicles (“DMV”) may testify about driver information associated with Defendant.

13. Flexdrive Services, LLC: A custodian of records of Flexdrive Services, LLC, may testify regarding leases or agreements with Defendant and/or Lyft, Inc., related to a Kia Nero, California License Plate No. 8RGY215 and other documents produced to the government pursuant to legal process.

14. Golden1 Credit Union (Gloria Hernandez): Gloria Hernandez, or another employee and records custodian of Golden1 Credit Union, may testify regarding bank forms and entries on bank statements related to Defendant.

15. Reddit, Inc. (Alex Yap): Alex Yap, or another employee and custodian of records of Reddit, Inc., may testify regarding the account associated with Defendant produced to the government pursuant to legal process, including content seized by search warrant.

16. T-Mobile, USA (Hillary Rapson): Hillary Rapson, Custodian of records of T-Mobile, USA, may testify about the records it keeps related to telephone call history and account information for Defendant.

17. Uber, Inc.: A representative of Uber, Inc., may testify regarding Defendant's activities as a driver for Uber and records produced to the government during the investigation of this matter.

Dated: September 16, 2024.

ISMAIL J. RAMSEY  
United States Attorney

/s/ Colin Sampson  
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